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June 11, 2004

Chairman Deborah Taylor Tate  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: Response of SprintCom, Inc. d/b/a Sprint PCS  
Docket No. 03-00633

Dear Chairman Tate:

Enclosed for filing in the above-referenced proceeding are the original and thirteen (13) copies of the Response of SprintCom, Inc. d/b/a Sprint PCS ("Sprint") to the Discovery Requests of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives. Sprint will provide supplemental responses to all outstanding discovery requests as soon as they are available.

Copies of Sprint's Response are being served upon all parties of record in this proceeding. If I can be of assistance, please call me at your convenience.

Sincerely yours,

Edward Phillips

HEP:sm

Enclosures

cc: R. Dale Grimes  
Timothy C. Phillips  
Melvin J. Malone

## CERTIFICATE OF SERVICE

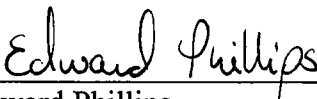
I hereby certify that I have served a copy of Sprint's Responses to Discovery Requests of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

This 11<sup>th</sup> day of June, 2004.

R. Dale Grimes  
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\_\_\_\_\_  
Edward Phillips  
SprintCom, Inc. d/b/a Sprint PCS

BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE

In Re:	)	
	)	
Tennessee Coalition of Rural Incumbent	)	
Telephone Companies and Cooperatives	)	
Request for Suspension of Wireline to	)	Docket No. 03-00633
Wireless Number Portability Obligations	)	
Pursuant to Section 251(f)(2) of the	)	
Communications Act of 1934, as Amended	)	

SPRINT'S RESPONSE TO DATA REQUESTS OF THE TENNESSEE COALITION OF  
RURAL INCUMBENT TELEPHONE COMPANIES AND COOPERATIVES

SprintCom, Inc. d/b/a Sprint PCS ("Sprint") by and through undersigned counsel, hereby submit Sprint's Responses to Data Requests of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives.

**DEFINITIONS**

In these discovery requests, the terms "document" or "documents" or "documentation" refers to all written, reported, recorded or graphic matter (including all drafts, originals and nonconforming copies that contain deletions, insertions, handwritten notes or comments, and the like) however produced or reproduced to any tangible or intangible, permanent or temporary record and, without limitation, shall include the following: all letters, correspondence, records of conferences or meetings, memoranda, notes, printed electronic mail ("e-mail"), telegrams, telephone logs, teletypes, telexes, banking records, notices of wire transfer of funds, canceled checks, books of account, budgets, financial records, contracts, agreements, invoices, speeches, transcripts, depositions, press releases, affidavits, communications with government bodies,

interoffice communications, working papers, newspaper or magazine articles, computer data, tax returns, vouchers, papers similar to any of the foregoing, and any other writings of every kind and description (whether or not actually used) and any other records from which information can be obtained and translated into reasonably usable form, including without limitation, e-mail, voice recordings, video and audio recordings, photographs, films, tapes and other data compilations.

### **DISCOVERY REQUESTS**

1. Please list since January 1, 1997 to the present the number of requests Sprint has received for numbers to be ported to Sprint from a wireline number of a customer served by any member of the Coalition. For each request, please list the company and exchange for the number that has requested porting, the telephone number associated with that request, and the date of the porting request

**RESPONSE:** Response to be provided as soon as possible.

2. Please provide a copy of each request from Sprint to a Coalition member for local number portability. Please state whether you consider any of these requests to be “bona fide” and please provide all factual and legal reasons supporting your position.

**RESPONSE:** Response to be provided as soon as possible.

3. Please state whether Sprint can comply with porting requests and provide service for customers within all areas serviced by the Coalition. If there are any areas where Sprint cannot accept porting requests and provide service within this area, please specify the exchange and the Coalition member that serves that location.

**RESPONSE:** Response to be provided as soon as possible.

4. Is Sprint willing to be responsible for the costs to transport calls to a ported number where Sprint has no physical point of interconnection on the Coalition's network?

**RESPONSE:** Response to be provided as soon as possible.

5. Please state your position on how calls to a ported number should be routed by the Coalition member.

**RESPONSE:** Response to be provided as soon as possible.

6. Please confirm that Sprint does not dispute the costs set forth by each Coalition member in the Amended Petition on pages 10-14. If Sprint's response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

**RESPONSE:** Response to be provided as soon as possible.

7. Please confirm that Sprint does not dispute the dates of in-office LNP technical, hardware, or software deployment, as provided in Attachment A to the Coalitions' Amended Petition. If Sprint's response is anything but an unqualified confirmation, please provide the legal and factual basis for the response.

**RESPONSE:** Response to be provided as soon as possible.

8. Identify each person whom you expect to call as an expert witness at any hearing in this docket, and for each such expert witness:

- (a) identify the field in which the witness to be offered as an expert;
- (b) provide complete background information, including the expert's current employer as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify, and identify all publications written or presentations presented in whole or in part by the witness;
- (c) provide the grounds (including without limitation any factual bases) for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (d) identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
- (e) identify for each such expert any person whom the expert consulted or otherwise communicated with in connection with his expected testimony;
- (f) identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions.
- (g) identify all documents or things shown to, delivered to, received from, relied upon, or prepared by any expert witness, which are related to the witness(es)' expected testimony in this case, whether or not such documents are supportive of such testimony, including without limitation all documents or things provided to that expert for review in connection with testimony and opinions, and
- (h) identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert.

**RESPONSE:** Please refer to Direct Testimony of witness Hoke R. Knox filed on behalf of Sprint in this docket on June 4, 2004.

9. Please produce copies of any and all documents referred to or relied upon in responding to the Coalition's discovery requests.

**RESPONSE:** Response to be provided as soon as possible.

10. Please provide all material provided to, reviewed by or produced by any expert or consultant retained by Sprint testify or to provide information from which another expert will testify concerning this case.

**RESPONSE:** Response to be provided as soon as possible.

11. Please produce all work papers of any of Sprint's proposed experts, including but not limited to file notes, chart notes, tests, test results, interview and/or consult notes and all other file documentation that any of Sprint's expert witness in any way used, created, generated or consulted by any of Sprint's expert witnesses in connection with the evaluation, conclusions and opinion in the captioned matter.

**RESPONSE:** Response to be provided as soon as possible.

12. Please produce a copy of all trade articles, journals, treatises and publications of any kind in any way utilized or relied upon by any of Sprint's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

**RESPONSE:** Response to be provided as soon as possible.

13. Please produce a copy of all documents which relate or pertain to any factual information provided to, gathered by, utilized or relied upon by any of Sprint's proposed expert witnesses in evaluating, reaching conclusions or formulating an opinion in the captioned matter.

**RESPONSE:** Response to be provided as soon as possible.

14. Please produce a copy of all articles, journals, books or speeches written or co-written by any of Sprint's expert witnesses, whether published or not.

**RESPONSE:** Response to be provided as soon as possible.

15. Please produce any and all documentation, items, reports, data, communications, and evidence of any kind that Sprint intends to offer as evidence at the hearing or to refer to in any way at the hearing.

**RESPONSE:** Response to be provided as soon as possible.

16. Please produce all documents that refer or relate to the subject matter of your responses to Request Nos. 1-7.

**RESPONSE:** Response to be provided as soon as possible.

17. Please identify by name, address, employer, and current telephone number, all persons having knowledge of the subject matter of your responses to Request Nos. 1-7.


**RESPONSE:** Response to be provided as soon as possible.

18. Please list all witnesses you expect will provide testimony at the hearing at this matter, including their name, address, and a summary of the scope of their testimony.

**RESPONSE:** Please refer to Direct Testimony of witness Hoke R. Knox filed on behalf of Sprint in this docket on June 4, 2004.



Respectfully submitted this the 11<sup>th</sup> day of June, 2004.

  
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